

Van W. Northern  
NORTHERN LEGAL, P.C.  
3545 S. Georgia Street  
Amarillo, Texas 79109  
Telephone: (806) 374-2266  
Facsimile: (806) 374-9535  
[northernlegalpc@gmail.com](mailto:northernlegalpc@gmail.com)

and

Joseph H. Mattingly III (Admission *Pro Hac Vice* Pending)  
JOSEPH H. MATTINGLY III, PLLC  
P.O. Box 678 – 104 West Main Street  
Lebanon, Kentucky 40033  
Telephone: (270) 692-1718  
Facsimile: (270) 692-1249  
Email: [joe@mattinglylawoffices.com](mailto:joe@mattinglylawoffices.com)

*Attorneys for Defendants, Acey Livestock, LLC; Micahel Acey;  
Barrett's Livestock, Inc.; and and Don Ralph Barrett*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**IN RE:**

**McCLAIN FEED YARD, INC.,  
McCLAIN FARMS, INC., and  
7M CATTLE FEEDERS, INC.,**

Debtors.

Chapter 7

CASE NO.: 23-20084-rlj  
Jointly Administered

**RABO AGRIFINANCE LLC,**

Plaintiff,

**vs.**

**ACEY LIVESTOCK, LLC, et al.,**

Defendants

**ADV. PROC. NO: 23-02005-rlj**

**Honorable Robert L. Jones**

**RESPONSE OF DEFENDANTS, ACEY LIVESTOCK, LLC; MICHAEL ACEY;  
BARRETT'S LIVESTOCK, INC.; AND DON RALPH BARRETT,  
TO JOINT MOTION FOR ENTRY OF ALTERNATIVE SCHEDULING ORDER**

Come the Defendants, Acey Livestock, LLC; Michael Acey; Barrett's Livestock, Inc.; and Don Ralph Barrett, by counsel, and as their Response to the Joint Motion of the Plaintiff, Rabo Agrifinance LLC, and the Defendant, Kent Ries, Chapter 7 Trustee, for the entry of an alternative Scheduling Order [DE# 147], state that they have no objection to the entry of the alternative Scheduling Order, as proposed, and join in the request for entry thereof.

WHEREFORE, the Defendants, Acey Livestock, LLC; Michael Acey; Barrett's Livestock, Inc.; and Don Ralph Barrett, respectfully request that the tendered alternative Scheduling Order be entered by the Court.

Respectfully Submitted,

/s/ Joseph H. Mattingly III  
**JOSEPH H. MATTINGLY III**  
Attorney at Law  
104 W. Main Street - P.O. Box 678  
Lebanon, Kentucky 40033  
(270) 692 – 1718  
[joe@mattinglylawoffices.com](mailto:joe@mattinglylawoffices.com)  
(Application for Admission *Pro Hac Vice* Pending)

and

Van W. Northern  
NORTHERN LEGAL, P.C.  
3545 S. Georgia Street  
Amarillo, Texas 79109  
Telephone: (806) 374-2266  
Facsimile: (806) 374-9535  
[northernlegalpc@gmail.com](mailto:northernlegalpc@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed by the Clerk of the Court on this 9<sup>th</sup> day of April, 2024, by using the CM/ECF system which will serve a notice of electronic filing upon all interested parties registered. A copy thereof has also been served by electronic mail to the following:

UNDERWOOD LAW FIRM, P.C.  
Thomas C. Riney  
W. Heath Hendricks  
500 South Taylor, Suite 1200, LB 233  
Amarillo, Texas 79101  
[tom.riney@uwlaw.com](mailto:tom.riney@uwlaw.com)  
[heath.hendricks@uwlaw.com](mailto:heath.hendricks@uwlaw.com)

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
Hudson M. Jobe  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
[hjobe@qslwm.com](mailto:hjobe@qslwm.com)

Michael R. Johnson  
RAY QUINNEY & NEBEKER P.C.  
36 South State Street, Suite 1400  
Salt Lake City, Utah 84111  
[mjohnson@rqn.com](mailto:mjohnson@rqn.com)

By: /s/ Joseph H. Mattingly III  
JOSEPH H. MATTINGLY